

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

BRENNAN M. GILMORE,

Plaintiff,

v.

ALEXANDER E. JONES, et al.,

Defendants.

Case No. 3:18-cv-00017

Declaration of Tim Fruge

Pursuant to 28 U.S.C. § 1746, I, Tim Fruge, declare as follows:

1. I am over the age of 18 years and am competent to make this declaration. I have personal knowledge of the facts stated herein, and if called as a witness, I could and would competently testify thereto.
2. I am Operations Manager of Defendant Free Speech Systems, LLC, and have been employed in a similar capacity for approximately a decade.
3. Free Speech Systems, LLC, is a Texas limited liability company with its principal place of business in Austin, Texas.
4. Free Speech Systems, LLC, operates the website Infowars.com and the “Alex Jones Channel” on YouTube.
5. Infowars, LLC, is a related Texas limited liability company that holds a nonexclusive license to the content published on Infowars.com. Its principal place of business is in Austin, Texas.
6. Free Speech Systems, LLC, and Infowars, LLC, do not maintain any offices in Virginia, do not employ employees in Virginia, and are not registered to do business in Virginia.
7. Free Speech Systems, LLC, and Infowars, LLC, do not own, use, or possess any real property in Virginia.

8. Free Speech Systems, LLC, and Infowars, LLC, do not maintain any bank accounts in Virginia.

9. Free Speech Systems, LLC, and Infowars, LLC, do not own any computer systems or servers in Virginia.

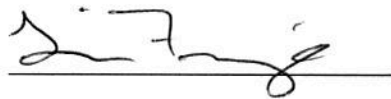
10. Infowars.com attracts a national and international audience. Its content targets a national and international audience. Its content is not targeted at a Virginia audience.

11. No section of Infowars.com concerns events in Virginia or of special interest to Virginia residents.

12. Infowars.com publishes advertisements directed at a national and international audience. It does not target advertisements at any geographical region; in particular, it does not target advertisements at Virginia. Instead, all visitors to Infowars.com, from any geographic location, are served the same advertisements.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of May, 2018, in Travis County, Texas.

A handwritten signature in black ink, appearing to read 'Tim Fruge', is written over a horizontal line.

Tim Fruge